

Please see file in case 11

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JOHN RICHARD JAE,

Plaintiff,

vs.

WEXFORD HEALTH SERVICES INC.,

Defendant.

CIVIL NO. 10-00-16

U.S. District Judge Ram
Magistrate Judge Smyth

FILED
HARRISBURG

DEC 14 2000

MARY E. D'ANDREA, CLERK
Per

DEPUTY CLERK

MOTION FOR ENLARGEMENT OF TIME

COMES now, the Plaintiff & his cause in the above entitled Civil

Action, John Richard Jae, as a Layman Unlettered in the Arts & Sciences
Laws & Legal Procedures Within the United States & now files his Motion
For Enlargement of Time, hereinafter who, avers, deposes & states:

1. That he is John Richard Jae, the Plaintiff & his cause herein the above entitled Civil Action whom makes this Motion pursuant
Fed-R-Civ-P 6(b).

2. On about August 28, 2000, Plaintiff filed his 42 U.S.C.
§ 1983 Civil Rights Complaint, herein the case.

3. On September 8, 2000, this Court granted Plaintiff leave
Proceed In forma Pauperis, herein the case.

4. On November 13, 2000, Defendant thru counsel filed
Motion to Dismiss Plaintiff's Complaint and Plaintiff's
Plaintiff's In forma Pauperis status, herein this case
and Defendants brief in support of Motion to Dismiss Plaintiff's
Complaint and Defendants brief in support of Motion to Revok
Plaintiff's In forma Pauperis status, were both filed herein this
on or about November 13, 2000.

1 Plaintiff needed his copies of such above defendant has

5. Due to the facts that this Plaintiff has been busy working on his Brief In Opposition To Corrections Defendants' Supplemental Brief In Support of Motion To Revoke Plaintiff's Inform Pauperis Status And His Defense Regarding Plaintiff's Amended Complaint and His Brief In Opposition To Defendant Clark's Motion To Dismiss Plaintiff's Complaint in Jae vs. Clark, et al., OMW-1-00-0049 and his petition for Review in Jae vs. Horn, et al. No. 4 M.D. 2000 (Pa. Cmwlth. Ct.), and due to the facts Plaintiff is confined in the SMU at SCI Greene & Prison severely limits the number of hours & breadth Plaintiff can go to use the small law library there (usually only once a month for two hours) and the legal materials therein are also extremely limited, this Plaintiff has been unable to do the necessary legal investigation & research which he needs to do first in order to enable him to prepare, file & serve his Brief In Opposition To Defendant's Motion To Dismiss Plaintiff's Complaint and his Brief In Opposition To Defendant's Motion To Revoke Plaintiff's Inform Pauperis Status, herein in this instant case, or before the present due date for both of such, herein, of December 15, 2000 thus he requests an enlargement of time of forty-five days from this date & including January 25, 2001 in which to file & serve both his Brief In Opposition To Defendant's Motion To Dismiss Plaintiff's Complaint and his Brief In Opposition To Defendant's Motion To Revoke Plaintiff's Inform Pauperis Status, herein in this instant case.

RESPECTFULLY YOURS,

John Richard Doe
MRE John RICHARD DOE
DOE, Esq., P.C.

Dated: 11th DECEMBER 2000

CIVIL No. 1-CR-00-1534

JAE VS. Wexford Health Services, Inc.

CERTIFICATE OF SERVICE

I, John Richard Daugherty certify that I am this 11th day of December, 2000, serving a true & correct ^{carbon} copy of the Plaintiff's Motion for Enlargement of Time, by 1st class Mail, Postage Prepaid addressed to:

MR. JAMES D. YANG, Esquire
LAVERY, FAHEY, Yang & PATERSON, P.C.
Attorneys at Law
P. O. Box 1245
Harrisburg, PA 17108-1245

(S) 
MR. JOHN RICHARD DAUGHERTY
Plaintiff and Plaintiff's Counsel

Dated / Executed:

11th December, 2000

At Waynesburg, Pennsylvania